

## Air Quality Permit

Issued To: Devon Energy Production Company, L.P.  
P.O. Box 2606  
Clear Creek Road  
Havre, MT 59501

Permit # 2769-08  
Administrative Amendment (AA)  
Request Received: 5/9/06  
Department Decision on AA: 5/19/06  
Permit Final: 6/06/06  
AFS #005-0006

An air quality permit, with conditions, is hereby granted to Devon Energy Production Company, L.P. pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

### Section I: Permitted Facilities

#### A. Plant Location

Devon Energy Production Company, L.P. (Devon) owns and operates a natural gas compressor station and associated equipment located in the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of Section 8, Township 27 North, Range 19 East in Blaine County, Montana. The facility is known as the Big Sandy Field, Station 103. A complete list of the permitted equipment can be found in the Section I.A of the permit analysis.

#### B. Current Permit Action

On May 9, 2006, the Department of Environmental Quality – Air Resources Management Bureau (Department) received a request to amend Permit #2769-07 to make the permit “de minimis friendly.” This will allow Devon to more quickly replace the permitted engine, if necessary, with equivalent or better engines. Permit #2769-08 replaces Permit #2769-07.

### Section II: Conditions and Limitations

#### A. Emission Limitations:

1. The maximum rated design capacity of compressor engine #01 shall not exceed 772 horsepower (hp) (ARM 17.8.749).
2. Compressor engine #01 shall be a rich-burn engine fitted with a non-selective catalytic reduction (NSCR) unit and an electronic air-to-fuel ratio (AFR) controller. Emissions from compressor engine #01 shall not exceed the pounds per hour (lb/hr) emission limits as calculated using the following equation and pollutant-specific grams per brake horsepower hour (g/bhp-hr) emission factors (ARM 17.8.749 & 17.8.752):

#### Emission Factor Equation:

$$\text{Lb/hr} = \text{emission factor (g/bhp-hr)} * \text{maximum rated design capacity of the engine (bhp)} * 0.002205 \text{ lb/g}$$

#### Emission Factors:

Nitrogen Oxides (NO <sub>x</sub> ) <sup>1</sup>	1.75 g/bhp-hr
Carbon Monoxide (CO)	1.80 g/bhp-hr
Volatile Organic Compounds (VOC)	1.25 g/bhp-hr

3. Devon shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
4. Devon shall not cause or authorize the use of any street, road, or parking lot, without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
5. Devon shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant, as necessary, to maintain compliance with the reasonable precautions limitation in Section II.A.4 (ARM 17.8.749).

B. Testing Requirements:

1. The Department may require testing (ARM 17.8.105).
2. All compliance source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

C. Operational Reporting Requirements:

1. Devon shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. Devon shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745 that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emissions unit.

The notice must be submitted to the Department in writing 10 days prior to start up or use of the proposed de minimis change or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).

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<sup>1</sup> NO<sub>x</sub> reported as NO<sub>2</sub>.

3. All records compiled in accordance with this permit must be maintained by Devon as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

D. Notification

1. Devon shall provide the Department with written notification of the actual installation of any replacement engine for compressor engine #01 (ARM 17.8.745).

Section III: General Conditions

- A. Inspection - Devon shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if Devon fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving Devon of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*, (ARM 17.8.756).
- D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 *et seq.*, MCA.
- E. Appeals - Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.
- F. Permit Inspection - As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by the Department at the location of the source.
- G. Permit Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Devon may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

Permit Analysis  
Devon Energy Production Company, L.P.  
Permit #2769-08

I. Introduction/Process Description

A. Permitted Equipment

Devon Energy Production Company, L.P. (Devon) owns and operates a natural gas compressor station and associated equipment located in the Southeast ¼ of the Southeast ¼ of Section 8, Township 27 North, Range 19 East in Blaine County, Montana. The facility is known as the Big Sandy Field, Station 103, and includes the following equipment:

1. (1) 1999 772 horsepower (Hp) Superior compressor engine;
2. (1) 230 Hp Ajax DPC compressor engine;
3. (1) Enertek tri-ethylene glycol (TEG) dehydrator and an associated 0.125 million British thermal unit per hour (MMBtu/hr) regenerator (reboiler);
4. (1) Pesco TEG dehydrator and an associated 0.20 MMBtu/hr reboiler; and
5. (3) Heaters rated at 0.12 MMBtu/hr, 0.075 MMBtu/hr, and 0.023 MMBtu/hr.

B. Source Description

The facility has two primary purposes. The first purpose is to pump the field gas up to the required pressure in the natural gas transmission system. Compression of the gas is accomplished using both the 772 Hp Superior compressor engine and the 230 Hp Ajax DPC compressor engine. The three heaters provide heat to the various station facilities.

The second purpose of the complex is to "dry" the gas as it is being processed. The gas contains some moisture, which must be removed from the system prior to being sent into the transmission system. This is accomplished with the dehydrators, also commonly called reboilers or glycol units.

The gas is treated with a glycol solution, which absorbs the water in the gas stream. The glycol solution is then heated to about 300°F to drive off the water and return the glycol. The heat necessary for this activity is generated by burning natural gas in the dehydrator reboilers. The Enertek dehydration unit reboiler has a heat input of 0.125 MMBtu/hr and the Pesco dehydration unit reboiler has a heat input of 0.20 MMBtu/hr. The reboilers are small by industrial standards, having a heat input capacity equivalent to a typical natural gas-fired small office heating system.

C. Permit History

On June 22, 1993, Montana Power Company (MPC) was issued Permit #2769-00 for the operation of their compressor station and associated equipment, located in the Southeast ¼ of the Southeast ¼ of Section 8, Township 27 North, Range 19 East in Blaine County, Montana. The station was identified as the Big Sandy Field, Station 103.

Permit #2769-01 was issued final to MPC on March 1, 1994. MPC requested the Department of Environmental Quality (Department) to modify Permit #2769-00 to revise the emission limitation units from grams per brake horsepower-hours (g/bhp-hr) to pounds per hour (lb/hr). The revision was due to varying parameters such as engine

revolutions per minute (RPM), operating load (bhp), ambient air temperature, gas temperature, site elevation, fuel gas quality, air/fuel ratio (AFR), field gas conditions, etc.

Rather than limit the engines to a g/bhp-hr limit, an established hourly emission limit (lb/hr) allowed operational flexibility. Also, to clarify NO<sub>x</sub> mass emission calculations, NO<sub>x</sub> emission limitations were identified as NO<sub>2</sub>. Permit #2769-01 replaced Permit #2769-00.

Permit #2769-02 was issued final on November 1, 1997. The modification transferred the ownership of the Big Sandy Field, Station 103, from MPC to the UMC Petroleum Corporation (UMC). In addition, a 230 Hp Ajax DPC compressor engine was added to the facility in accordance with the provisions of the Administrative Rules of Montana (ARM) 17.8.705(1)(r). Further, the rule references were updated in the permit to reflect current Department practices. Permit #2769-02 replaced Permit #2769-01.

On May 7, 1999, the Department received notification that UMC merged with Havre Pipeline Company, LLC (HPC). The modification changed the name on the permit from UMC to HPC. Permit #2769-03 replaced Permit #2769-02 on June 27, 1999.

On October 15, 1999, HPC proposed the installation and operation of a 772 Hp Superior compressor engine and a Lakota Dehydrator at the Big Sandy Field, Station 103, in accordance with the provisions of ARM 17.8.705(1)(r). HPC proposed to remove the existing 600 Hp White Superior compressor engine after the above cited proposed equipment was installed. This modification added the 772 Hp Superior compressor engine and the Enertek Dehydrator to the permit in accordance with the provisions of ARM 17.8.705(1)(r). In addition, a condition was added to the permit requiring that the 600 Hp White Superior compressor engine be removed within 6 months after Permit #2769-04 became final. Permit #2769-04 replaced Permit #2769-03 on November 7, 1999.

On August 5, 2002, the Department received a letter dated August 1, 2002, from Bison Engineering, Inc. (Bison) on behalf of HPC. HPC proposed to install a Pesco TEG dehydrator and an associated 0.20 MMBtu/hr reboiler. The Department requested additional information from HPC in regard to the dehydration units that are to be operated at the facility. On September 24, 2002, Bison submitted the requested information to the Department on behalf of HPC. In addition, on December 27, 1999, the Department received a letter dated December 22, 1999, from Bison on behalf of HPC, notifying the Department that the 600 Hp White Superior compressor engine was removed from the facility, fulfilling the requirement contained in Section II.A.3 of Permit #2769-04.

The Pesco TEG dehydrator and the associated 0.20 MMBtu/hr reboiler were added to the permit in accordance with the provisions of ARM 17.8.705(1)(r). In addition, the make, manufacturer, and size of the dehydration units to be operated at the facility were identified and the 600 Hp White Superior compressor engine was removed from the permit. Further, the permit was updated to reflect current Department permit format and permit language. **Permit #2769-05** replaced Permit #2769-04 on December 17, 2002.

The Department received a letter dated August 19, 2004, from Devon-Louisiana Corporation to change the corporate name on Permit #2769-05 from Ocean Energy, Inc., Havre Pipeline Company to Devon-Louisiana Corporation. The Department transferred ownership of Permit #2769-05 to Devon-Louisiana Corporation. **Permit #2769-06** replaced Permit #2769-05.

On March 13, 2006, the Department received a request to change the company name on Permit #2769-06 from Devon-Louisiana Corporation, to Devon Energy Production Company, L.P. This permit action changed the company name on Permit #2769-07 as requested. Permit **#2769-07** replaced Permit #2769-06.

D. Current Permit Action

On May 9, 2006, the Department received a request to amend Permit #2769-07 to make the permit “de minimis friendly.” This will allow Devon to more quickly replace the permitted engine, if necessary, with equivalent or better engines. Permit **#2769-08** replaces Permit #2769-07.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the ARM and are available, upon request, from the Department. Upon request, the Department will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 - General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Devon shall comply with all requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.

5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant which would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 - Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide;
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter;
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>
11. ARM 17.8.230 Fluoride in Forage

Devon must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes, and from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of 20% for all fugitive emissions sources and that reasonable precautions be taken to control emissions of airborne particulate. (2) Under this rule, Devon shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere, particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere, particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.322 Sulfur Oxide Emissions -- Sulfur in Fuel. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. Devon will consume pipeline quality natural gas

in the compressor engines and the two dehydration unit reboilers, which will meet this limitation.

6. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates 40 CFR 60, Standards of Performance for New Stationary Sources (NSPS). The Devon, Big Sandy Field, Station 103, is not an NSPS affected source because it does not meet the definition of a natural gas processing plant as defined in 40 CFR Part 60, Subpart KKK, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants.
7. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. A major Hazardous Air Pollutant (HAP) source, as defined and applied in 40 CFR 63, shall comply with the requirements of 40 CFR 63, as applicable, including the following subparts:
  - Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.
  - Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities
  - Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.

Based on the information submitted by Devon, the CS-102 facility is not subject to the provisions of 40 CFR Part 63, because the facility is not a major source of HAPs.

D. ARM 17.8, Subchapter 5 - Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This section requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. Devon was not required to submit an application fee for the current permit action because the current permit action was administrative.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by the Department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, as described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions which prorate the required fee amount.

E. ARM 17.8, Subchapter 7 - Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:



1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 General Procedures for Air Quality Preconstruction Permitting. An air quality preconstruction permit shall contain requirements and conditions applicable to both construction and subsequent use of the permitted equipment.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration, or use of a source. Devon was not required to submit an application for the current permit action because the current permit action is administrative.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Devon of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within

the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

F. ARM 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the Federal Clean Air Act (FCAA) that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source since this facility is not a listed source and the facility's potential to emit is below 250 tons per year (excluding fugitive emissions) of any air pollutant.

G. ARM 17.8, Subchapter 12 - Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under section 7412 of the FCAA is defined as any stationary source having:
  - a. Potential To Emit (PTE) > 100 tons/year of any pollutant;
  - b. PTE >10 tons/year of any one HAP, PTE > 25 tons/year of a combination of all HAPs, or a lesser quantity as the Department may establish by rule; or

- c. Sources with the PTE > 70 tons/year of PM<sub>10</sub> in a serious PM<sub>10</sub> nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #2769-07 for the Devon facility, the following conclusions were made:
    - a. The facility's PTE is less than 100 tons/year for all criteria pollutants.
    - b. The facility's PTE is less than 10 tons/year of any one HAP and less than 25 tons/year of all HAPs.
    - c. This source is not located in a serious PM<sub>10</sub> nonattainment area.
    - d. This source is not subject to any current NSPS standard.
    - e. This facility is not subject to any current NESHAP standards.
    - f. This source is not a Title IV affected source nor a solid waste combustion unit.
    - g. This source is not an EPA designated Title V source.

Based on these facts, the Department determined that Devon will be a minor source of emissions as defined under Title V.

### III. BACT Determination

A BACT determination is required for each new or altered source. Devon shall install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized. However, the current permit action was an administrative action, therefore a BACT analysis is not required.

### IV. Emission Inventory

Source	Tons/Year				
	PM <sub>10</sub>	NO <sub>x</sub>	CO	VOC	SO <sub>x</sub>
Superior (772 Hp)	0.54	13.05	13.42	9.32	0.03
Ajax DPC (230 Hp)	0.22	6.66	2.44	6.00	0.01
Enertek Dehydrator	0.01	0.13	0.01	0.03	0.00
-Still Vent	0.00	0.00	0.00	4.91	0.00
Pesco Dehydrator	0.01	0.16	0.14	0.01	0.00
-Still Vent	0.00	0.00	0.00	3.02	0.00
Heaters (3)	0.00	0.10	0.00	0.01	0.00
Total	0.78	20.10	16.01	23.30	0.04

\* A complete emission inventory is on file with the Department.

### V. Existing Air Quality and Monitoring Requirements

The existing air quality of the area is expected to be in compliance with all state and federal requirements. Ambient air quality modeling was conducted in the past for all compressor stations in and near Glacier, Toole, Liberty, and Pondera Counties using two EPA guideline models, ISC2 and COMPLEX. The meteorological data used was taken from the Great Falls Airport National

Weather Service station. The modeling submitted for Big Sandy Field, Station 103, assumed approximately 89.2 tons per year of NO<sub>x</sub> and 89.2 tons per year of CO. The modeling did not show violations of the annual or hourly ambient standards. Since the allowable emissions in this permit are less than the modeled levels and the modeling analyses demonstrates that this facility will not cause a violation or exceedance of any state or federal ambient standard, the facility emissions will still not cause or contribute to a violation of the hourly or annual ambient standards.

VI. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined that there are no taking or damaging implications.

VII. Environmental Assessment

An environmental assessment was not required for the current permit action because the current permit action was administrative.

Permit Analysis prepared by: Christine Weaver  
Date: 05/18/06